

EXHIBIT 1

From: [Vipin Jain](#)
To: pmcgill@sheppardmullin.com
Cc: [Vipin Jain](#)
Subject: Response to Blendjet's subpoena in connection with its civil action with Blendtec
Attachments: [Re Blendjet Subpoena.pdf](#)
[2022-12-05 - Blendtec's Objections to Blendjet's Subpoena to Blendid.docx](#)

Dear Mr. McGill,

In response to the subpoena served on Blendid, Blendid states the following:

Blendid understands that Blendtec is filing objections to the subpoena as well as a motion for protective order and motion to quash. Blendid incorporates Blendtec's objections to this response (added as an attachment to this response).

Blendid declines to produce documents in response to Request Nos. 1-8 on the following grounds:

1. Request Nos. 1-7 request documents that are not relevant to the lawsuit between Blendtec and Blendjet. The Blendid mark is not at issue in the lawsuit between Blendtec and Blendjet.
2. Request Nos. 1-7 request confidential or trade secret documents belonging to Blendid, a non-party, that have no relevance to the lawsuit between the parties.
3. Request Nos. 1-7 potentially seek documents that are protected by the attorney-client privilege or other privilege.
4. Request Nos 1-6 are unduly burdensome as they demand that a non-party search for and produce broad categories of documents that have no relevance to the lawsuit.
5. Request Nos. 7-8 are overbroad and unduly burdensome, particularly because Blendid is not a party to this matter. The subpoena requests documents and information that would be in the possession of Blendtec, a party to the lawsuit. Blendid should not be burdened by a subpoena when the requested documents can be obtained from Blendtec.
6. Request Nos. 7-8 seek documents to which Blendtec has an interest. Blendtec may have confidentiality or other interests in these documents and should be allowed to preserve its rights and present any objections it has with respect to those documents.
7. Blendid understands that Blendtec is filing a motion for protective order and motion to quash with respect to Request Nos. 7-8 and declines to produce documents until those motions have been resolved.

Based on these objections, Blendid declines to produce documents in response to Request Nos. 1-8.

Blendid has no documents responsive to request No. 9.

Blendid is producing herewith documents responsive to request No. 10. The first attachment is the email communication that took place between Blendid and Blendtec once we were notified by Blendtec that a subpoena might be coming forth.

The second attachment is a copy of the objections to the subpoena to 6d bytes DBA Blendid filed by Blendtec and referenced at the top of this email response.

Please feel free to reach out should you have any questions.

Regards.

Vipin Jain
Co-founder & CEO
<https://www.blendid.com>